



February 26, 2025

Via ECF

The Honorable Joel H. Slomsky
United States District Court
5614 James A. Byrne United States Courthouse
601 Market Street
Philadelphia, PA 19106

**RE: April Ploeger v. The Trustees of the University of
Pennsylvania, E.D. Pa., No. 2:22-cv-02389-JHS**

Dear Judge Slomsky:

I write on behalf of the Defendant in this case, The Trustees of the University of Pennsylvania. When I last wrote to the Court on December 30, 2024, we requested an extension of the expert deadlines and trial date. The Court then entered the Seventh Amended Scheduling Order (doc. 38), which also extended other deadlines, including the deadline for filing dispositive motions.

As the Court is aware, Defendant filed its Motion for Summary Judgment on December 27, 2024 (doc. 36) in accordance with the Scheduling Order then in place (doc. 27). That Motion is currently pending and has not been opposed. In recent discussion with Plaintiff's counsel, he suggested that the new Scheduling Order somehow deemed our Motion as "stricken," a position with which we do not agree.

In candor to the Court, the parties are continuing to resolve one open discovery issue: a Rule 30(b)(6) deposition notice served by Plaintiff prior to the close of discovery in October 2024. These depositions are anticipated to occur in the first three weeks of April 2025 (by April 17, 2025). It is our intention to supplement the summary judgment record after those depositions are completed, and we respectfully request 40 days to do so, or by May 27, 2025. Therefore, we respectfully request that the Court hold our summary judgment motion in abeyance until the time we can submit a supplemental filing.

Plaintiff's counsel does not oppose this request.

Respectfully yours,

A handwritten signature in cursive script that reads 'Leslie Miller Greenspan'.

Leslie Miller Greenspan

cc: Mart Harris, Esquire (via ECF)